UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 30 2015

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL 7009 1680 0000 7648 7986**
**RETURN RECEIPT REQUESTED**

Mr. John C. Teimeyer
Corporate Director
Global Environmental, Health, Safety and Security
StandardAero
1200 North Airport Drive
Springfield, Illinois 62707

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILD089637847

Dear Mr. Teimeyer:

On May 19, 2015 a representative of the U.S. Environmental Protection Agency inspected the StandardAero Business Aviation facility located in Springfield, Illinois (StandardAero). As a large quantity generator of hazardous waste, StandardAero is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate StandardAero's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by StandardAero, EPA's review of records pertaining to StandardAero, and the inspector's observations, EPA has determined that StandardAero has unlawfully stored hazardous waste without a permit or interim status as a result of StandardAero's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which StandardAero was out of compliance at the time of the inspection in paragraphs 1 through 4, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste

storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 4 is also an independent TSD requirement incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of StandardAero to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

**STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, StandardAero was out of compliance with the following large quantity generator permit exemption conditions:

1. Date When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation began.

At the time of the inspection, a hopper of hazardous waste located in the "90-day" storage area of the Aircraft Painting Hangar was not marked with an accumulation start date (see photograph 15 of the attached inspection report).

2. Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(a)(3) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste." Satellite accumulation containers must be marked with the words, "Hazardous Waste," or other words that identify the contents of the containers. See, Ill. Admin. Code tit. 35 § 722.134(c)(1)(B) [40 C.F.R. § 262.34(c)(1)(ii)].

At the time of the inspection, a hopper of hazardous waste located in the "90-day" storage area of the Aircraft Painting Hangar was not labeled with the words, "Hazardous Waste (see photograph 15 of the attached inspection report).

At the time of the inspection, one container of hazardous paint can waste located in the paint mixing room at the Aircraft Painting Hangar was not labeled with the words, "Hazardous Waste," or with other content-describing words (see photograph 11 of the attached inspection report).

At the time of the inspection, one container of hazardous sandpaper waste located in hangar P2 of the Aircraft Painting Hanger was not labeled with the words, "Hazardous

Waste," or with other content-describing words (see photograph 12 of the attached inspection report).

3. Storage Units

Under Ill. Admin. Code tit. 35 § 722.134(a)(1) [40 C.F.R. § 262.34(a)(1)] a large quantity generator may only store hazardous waste in container, tanks, drip pads and containment buildings. At the time of the inspection, bead blast waste was located on the floor of the electric shop of the Main Hanger.

**The permit exemption condition identified in paragraph 4, below, is also an independent TSD requirement violated by StandardAero.**

4. Use and Management of Containers

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.273(a) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)], a large quantity generator must always keep a container holding hazardous waste closed, except when it is necessary to add or remove waste.

At the time of the inspection, the following containers of hazardous waste located in the Aircraft Painting Hanger were open, though waste was not being added to, or removed from the containers:

a) One hopper of hazardous waste located in the "90-day" storage area (see photograph 15 of the attached inspection report);
b) One container of hazardous waste paint cans located in the paint mixing room (see photograph 11 of the attached inspection report); and
c) One container of hazardous waste sand paper located in the hangar P2 (see photograph 12 of the attached inspection report).

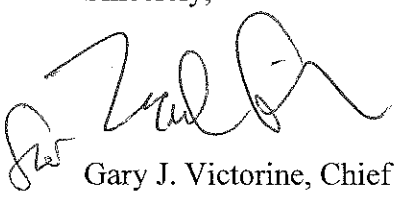
**Summary:** By failing to comply with the conditions for a permit exemption, above, StandardAero became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. StandardAero failed to apply for such a permit. StandardAero's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring StandardAero to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1 through 4, above. According to Section 3008(a) of RCRA,

EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions and requirements. You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091or at brown.todd@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Paul Eisenbrandt Illinois EPA (paul.eisenbrandt@illinois.gov)
Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

**U. S. Environmental Protection Agency**
**Region 5, Land and Chemicals Division**
**RCRA Branch**
**77 West Jackson Boulevard**
**Chicago, Illinois 60604**

# RCRA COMPLIANCE EVALUATION INSPECTION REPORT

| | |
|---|---|
| **SITE NAME:** | StandardAero Business Aviation |
| **EPA ID NUMBER:** | ILD089637847 |
| **ADDRESS:** | 1200 North Airport Drive<br>Springfield, Illinois 62707 |
| **DATE OF INSPECTION:** | May 19, 2015 |
| **EPA INSPECTOR:** | Todd C. Brown<br>Environmental Scientist |

**PREPARED BY:**

Todd C. Brown — Date 6/9/15
Compliance Section 1

**APPROVED BY:**

Michael Cunningham, Chief — Date 6/9/15
Compliance Section 1

## I. PURPOSE OF INSPECTION

This purpose of this inspection was to evaluate Standard Aero Business Aviation's (StandardAero) compliance with federal and state regulations at 40 C.F.R. Parts 260 through 279; and 35 Ill. Admin. Code Parts 720 through 739, regarding the treatment, storage and disposal of hazardous waste and used oil.

## II. PARTICIPANTS

***Inspector(s):***

Todd Brown
Environmental Scientist
U.S. EPA

Paul Eisenbrandt
Environmental Protection Specialist
Illinois Environmental Protection Agency

***Site Representative(s):***

John C. Teimeyer
Corporate Director
Global Environmental, Health, Safety and Security

Cortney Graham
Corporate Manager, Health and Safety

## III. OPENING CONFENCE

I arrived at StandardAero on May 19, 2015, at approximately 9:53 A.M Mr. Paul Eisenbrandt from the Illinois Environmental Protection Agency (IEPA) was on-site, and accompanied me throughout the inspection.

I conducted an opening conference with Mr. John C. Teimeyer, Corporate Director, Global Environmental, Health, Safety and Security; and Ms. Cortney Graham, Corporate Manager, Health & Safety. I presented Mr. Teimeyer with my credentials, explained the purpose of the inspection, and interviewed StandardAero on facility operations and waste management procedures. Information provided in response to my inquiry is included in Section IV (Site Description), below.

I provided StandardAero with EPA's Small Business Resources Handout, a list of pollution prevention contacts in Region 5, and a pamphlet from the Illinois Sustainable Technology Center entitled, Sustaining the Economy and Environmental of Illinois.

During the conference, I informed Mr. Teimeyer on the public nature of government records, and therefore, the need for StandardAero to identify confidential business information (CBI) collected during the inspection. No CBI claims were made during the course of the inspection.

## IV. SITE DESCRIPTION

StandardAero operates an aircraft rework facility which includes replacing and reinstalling avionics, flights systems, and interiors; and maintaining and repairing engines and mechanical systems. These operations take place in the Main Hanger (Hangars A through D). A separate building houses the Aircraft Painting Hangar where airplanes are stripped of their existing coating, and repainted. The Aircraft Painting Hangar is divided into three hangars (P1 through P3).

Hazardous waste streams generated at StandardAero include[1]:

- Solid Paint Waste (debris contaminated with methyl ethyl ketone, methylene chloride, barium, cadmium, chromium and/or lead-bearing paint),
- Liquid Paint Waste (barium, cadmium, chromium, and/or lead-bearing paint, xylene, methyl isobutyl ketone, acetone and/or alcohols),
- Rags containing methyl ethyl ketone,
- Fuel Absorbents (absorbent material containing jet fuel, gasoline, and used oil),
- Paint Chips and Solids (barium, cadmium, chromium, and/or lead-bearing paint chips, and paint striper),
- Spent Aircraft Rinse Water with Solvents (contains chromium, methanol, methylene chloride, toluene and water),
- Spent Filter Media (filters contaminated with barium, cadmium, chromium and/or lead-bearing paint),
- Spent blast beads,
- Spent etch/alodine wastewater (hydrofluoric acid, chromic acid, and potassium ferricyanide),
- Non-empty aerosol cans, and
- Universal waste batteries and lamps.

With the exception of spent aircraft rinse water, hazardous wastes are stored in containers (drums and roll-off containers). Spent aircraft rinse water is generated in the Aircraft Painting Hangar, where solvent is applied to an aircraft to remove its existing coat of paint. The solvent is rinsed from the surface of the aircraft with water. The rinse water accumulates on the floor of the hangar, and is pumped to two indoor hazardous waste storage tanks (5,000 and 1,500 gallon capacities).

StandardAero is owned by Dubai Aerospace Company. It has approximately 250 employees on staff.

[1] Source: StandardAero Emergency Contingency Plan, Revised February 20, 2015.

## V. SITE TOUR

I toured the facility with Messrs. Teimeyer, Eisenbrandt, and Ms. Graham. The tour included the Main Hangar, Aircraft Painting Hangar, and outdoor portions of the facility.

Hangars A through D were each equipped with three to four satellite accumulation containers (photographs 1 and 4) for collection of hazardous solid paint waste, liquid paint waste, aerosol can waste, and humbug detector kit waste (used on testing engine fuel). Each container was labeled as hazardous waste and closed. Used oil collection totes were located in Hangars A and D (photographs 2 and 5), A container of used oil filters, labeled as hazardous waste, was located in Hangar A.

Three containers of universal waste batteries were located in Hangar D (photograph 6). The containers held spent nickel-cadmium, lithium ion, and lead acid batteries, respectively.

An electric shop is located in the Main Hangar. A bead blasting machine is located in this area. Two satellite accumulation containers were present for collection of liquid paint waste and bead blast waste (photograph 7). Both of these containers were labeled as hazardous waste and closed. Bead blast material was present on the floor in the vicinity of a bead blast machine (photograph 8).

An underground storage tank is located outside (photograph 9). The tank is used to store jet fuel removed from aircraft prior to servicing.

A roll-off container for storage of hazardous waste is located outside of the Aircraft Painting Hangar (photograph 10). The container was labeled as hazardous waste, and marked with an accumulation start date of May 17, 2015. According to the facility representatives, it contained paint-booth filters.

A room housing a small-scale etching process is located in the Main Hangar. A tote container of rinse water generated by this process was located in the area (photograph 16). The container was labeled as a "non-hazardous" waste.

The Aircraft Painting Hangar is divided into three areas. Hangar P1 is primarily used for painting aircraft; Hangar P2 for preparing aircraft for painting (e.g., sanding); and Hangar P3 for stripping paint from aircraft. A drum of used paint cans was located at the Paint Mixing Room (photograph 11). The container was open, and unlabeled. According to facility representatives, the contents would be transferred to the hazardous waste roll-off container. An open trash can with used sandpaper was located in Hangar P2 (photograph 12). The container was unlabeled. According to an operator in the area, its contents would be transferred to the hazardous waste roll-off container. Rags with methyl ethyl ketone are used to wipe aircraft after sanding.

The two hazardous waste storage tanks are located in the Aircraft Painting Hangar (photograph 13). Both tanks were labeled with the words, "hazardous waste." Reportedly, only the larger tank contained waste at the time of the inspection. The accumulation start date for this tank was noted

as April 15, 2015. The label on the tanks included the words, "Hazardous Waste Liquid," and the EPA hazardous waste numbers: D006, F002, and F019.

A "90-day" storage area for containers of hazardous waste is located directly across from the storage tanks. Six containers of hazardous waste were present at the time of the inspection (photograph 14). All of the containers were closed, labeled, and marked with accumulation dates within 90 days of the date of the inspection.

An open hopper of waste material generated in Hangar P2 was located near the 90 day storage area. The container was not labeled as hazardous waste. However, the StandardAero representatives explained the material would be added to the hazardous waste roll-off container.

## VI. RECORDS REVIEW

The records reviewed included: hazardous waste manifests, land disposal restriction forms, contingency plan, inspection logs, waste determination records, training records, the 2014 Annual Hazardous Waste Report, and documents regarding assessments of the hazardous waste tank systems.

### *Hazardous Waste Manifests*

Manifest documents were on-file dating back at least three years. Land disposal restriction notifications were on-file with the manifests. No deficiencies with these documents were noted.

### *Contingency Plan*

Standard Aero maintains an Emergency Contingency Plan. The document was last updated on February 20, 2015. No deficiencies with this document were noted. A copy of this document was obtained by the inspector.

### *Inspection Records*

StandardAero maintains records of daily inspections of its hazardous waste tank systems.

### *Waste Determination Records*

StandardAero maintains a waste profile for its spent aircraft rinse water waste. It reports the following constituent concentrations based on "generator knowledge":

- Barium: 0 – 99 ppm,
- Cadmium: 1 – 1000 ppm,
- Methylene chloride: 0 – 1%,
- Phenol: 0 – 1%,
- Sodium hydroxide: 0 – 5%, and
- Water 90 – 95%.

StandardAero collected a sample of its "non-hazardous" solid paint wastes in 2014. The sample was analyzed according the Toxicity Characteristic Leaching Procedure (TCLP). None of the TCLP metals were detected at or above the regulatory level.

***RCRA Training Records***

Mr. Lawrence Patterson is currently StandardAero's emergency coordinator and was hired approximately one year ago. The records indicate he received off-site training regarding RCRA provided by Lion Technology, Inc. on January 13, 2015. Ms. Graham last attended the training in June of 2014. On May 29, 2015, StandardAero stated in e-mail that three "hazardous waste workers," Messrs. Jim Isaacs, Kent Meyer, and Craig Martin, last received relevant training in June of 2014.[2]

***Hazardous Waste Tank System Records***

Records indicate that the hazardous waste tank systems have been evaluated for no detectable emissions from their fixed roof by Krueger Engineering Services (Springfield, Illinois), now ProSentia Integrated Solutions.

On May 29, 2015, StandardAero provided the following documents regarding the hazardous waste tank systems:[2]

- Waste Accumulation Tank System Compliance Demonstration Document (with Rinsewater Analysis) prepared by Krueger Engineering & Sciences and Radian International in February 1999 (Tank Compliance Demonstration); and

- May 5, 2006 letter from ProSentia Integrated Solutions regarding "Waste Accumulation Tank System Subpart J Tank System Assessment and Re-Certification Aircraft Paint Hangar (ProSentia Letter)."

The Tank Compliance Demonstration discusses the tank systems' compliance with provisions of 40 CFR Part 265, Subparts J, AA, BB, and CC. The document states the tanks were evaluated for integrity under 40 CFR § 265.192 with reference to a document entitled, "Waste Accumulation Tank System Assessment and Certification (February 1999)" (WATS Certification). According to analyses not included, the total organic concentration of the waste stored in the tank system is 2.58%.

The ProSentia Letter was prepared by Mr. Curtis A. Krueger, P.E. It references the previous WATS Certification, and states that ProSentia observed the tank systems on April 7, 2006, and found them to be in compliance with 40 CFR Part 265, Subpart J, with respect to design, component features, and operation. The ProSentia Letter further states that no leaks, signs of potential leaks, and component deterioration were observed at the time of evaluation. The waste stream stored in the tank systems is described as rinse water containing methylene chloride.

[2] E-mail from Ms. Cortney Graham, StandardAero, to Todd Brown, U.S. EPA, on May 29, 2015.

*2014 Hazardous Waste Report*

A copy of StandardAero's 2014 Hazardous Waste Report was obtained by the inspector. Table 1 summarizes the waste streams generated for the reporting year. StandardAero is identified as a small quantity generator for the reporting year.

**Table 1.** 2014 Hazardous Waste Report Summary

| Description | Hazardous Waste Numbers | Amount Generated |
|---|---|---|
| **Hazardous Waste Liquid, NOS (Cadmium, Chromium)** | D006, F002, and F019 | 40,425 gallons |
| **Hazardous Waste Solid NOS (Xylene, Toluene)** | F003, F005 | 6,500 pounds |
| **Waste Paint** | F003, D001, D005 and D007 | 2,145 gallons |
| **Waste Paint Related Material** | F003, F005, D001, D005 and D006 | 370 gallons |
| **Waste Paint Related Material** | D001, D018, D035, D039, and F003 | 30 gallons |

## VII. CLOSING CONFERENCE

I departed StandardAero at 3:00 P.M.

## ATTACHMENTS

A. Inspection Photographs
B. Checklist

# Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 1

***Photo Filename*** DSCN0715.JPG

***Date/Time*** 5/19/2015 11:27:46 AM

***Photographer*** Todd Brown

***Description***

Three hazardous waste satellite accumulation containers and one container of mats located in Hangar A. The satellite containers hold: (1) liquid paint waste, (2) solid paint waste, and (3) aerosol can waste.


***Photo Number*** 2

***Photo Filename*** DSCN0716.JPG

***Date/Time*** 5/19/2015 11:32:54 AM

***Photographer*** Todd Brown

***Description***

Used oil collection tote located in Hangar A.

# Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 3

***Photo Filename*** DSCN0717.JPG

***Date/Time*** 5/19/2015
11:33:12 AM

***Photographer*** Todd Brown

***Description***

Photograph of floor in Hangar A (accidental photograph).

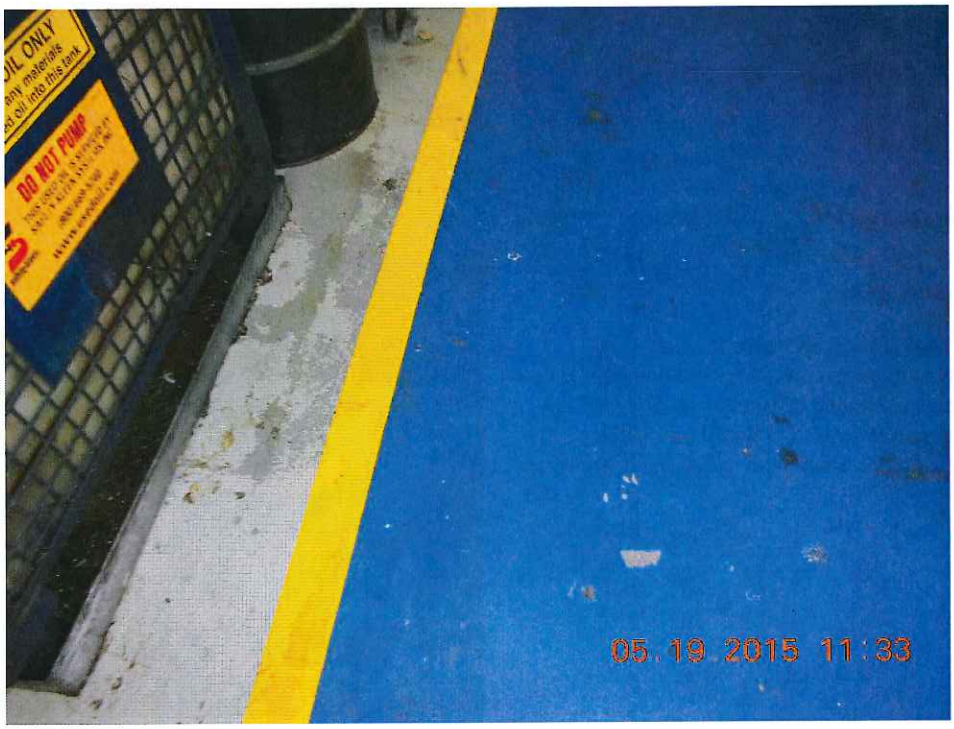



***Photo Number*** 4

***Photo Filename*** DSCN0718.JPG

***Date/Time*** 5/19/2015
11:38:30 AM

***Photographer*** Todd Brown

***Description***

Four hazardous waste satellite accumulation containers and one trash can located in Hangar C. The satellite containers hold: (1) liquid paint waste, (2) solid paint waste, (3) aerosol can waste, and (4) humbug detector kit waste.

## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 5

***Photo Filename*** DSCN0719.JPG

***Date/Time*** 5/19/2015 11:46:36 AM

***Photographer*** Todd Brown

***Description***

Used oil collection tote located in Hangar D.


***Photo Number*** 6

***Photo Filename*** DSCN0720.JPG

***Date/Time*** 5/19/2015 11:58:38 AM

***Photographer*** Todd Brown

***Description***

Three containers of universal waste batteries located in Hangar D. The containers held nickel-cadmium, lithium ion, and lead-acid batteries.

## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 7

***Photo Filename*** DSCN0721.JPG

***Date/Time*** 5/19/2015
12:02:52 PM

***Photographer*** Todd Brown

***Description***

Two 55-gallon containers of hazardous waste located in the electric shop. The containers contained liquid paint waste and bead blast waste, respectively.


***Photo Number*** 8

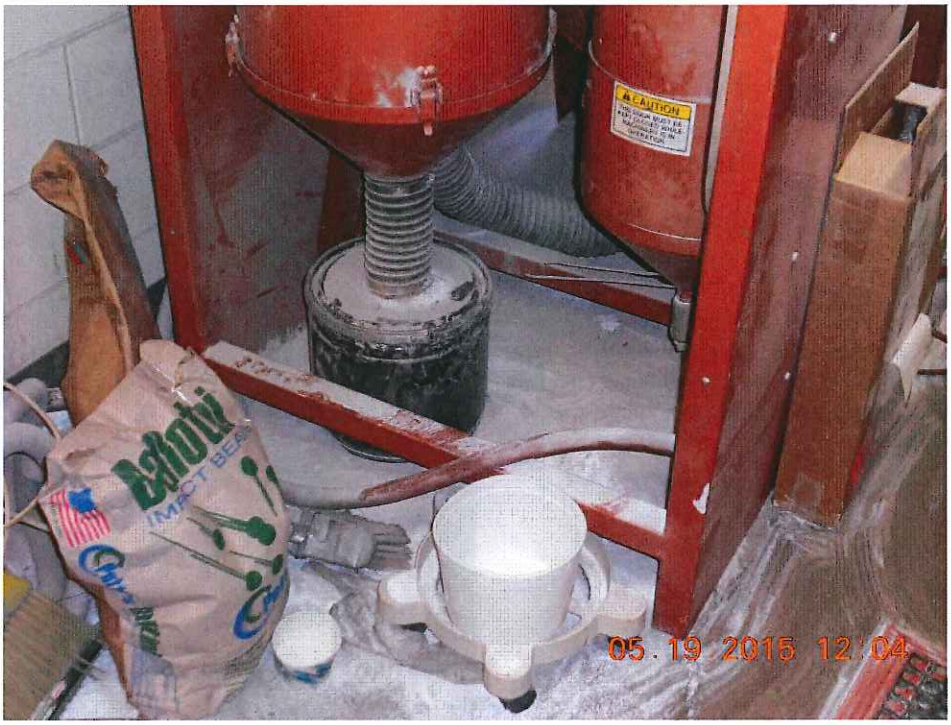
***Photo Filename*** DSCN0722.JPG

***Date/Time*** 5/19/2015
12:04:04 PM

***Photographer*** Todd Brown

***Description***

Bead blast material on the floor of the electric shop.



## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 9

***Photo Filename*** DSCN0723.JPG

***Date/Time*** 5/19/2015 12:25:32 PM

***Photographer*** Todd Brown

***Description***

Location of an underground storage tank for storage of gasoline removed from aircraft during maintenance.


***Photo Number*** 10

***Photo Filename*** DSCN0724.JPG

***Date/Time*** 5/19/2015 12:33:14 PM

***Photographer*** Todd Brown

***Description***

Roll-off container of hazardous waste located outside of paint shop. The container holds waste air filters.

## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 11

***Photo Filename*** DSCN0725.JPG

***Date/Time*** 5/19/2015
12:48:00 PM

***Photographer*** Todd Brown

***Description***

Container of used paint cans located in the Paint Mixing Room. The container was not labeled or closed. The contents would reportedly be placed in the hazardous waste roll-off container outside of the paint shop.

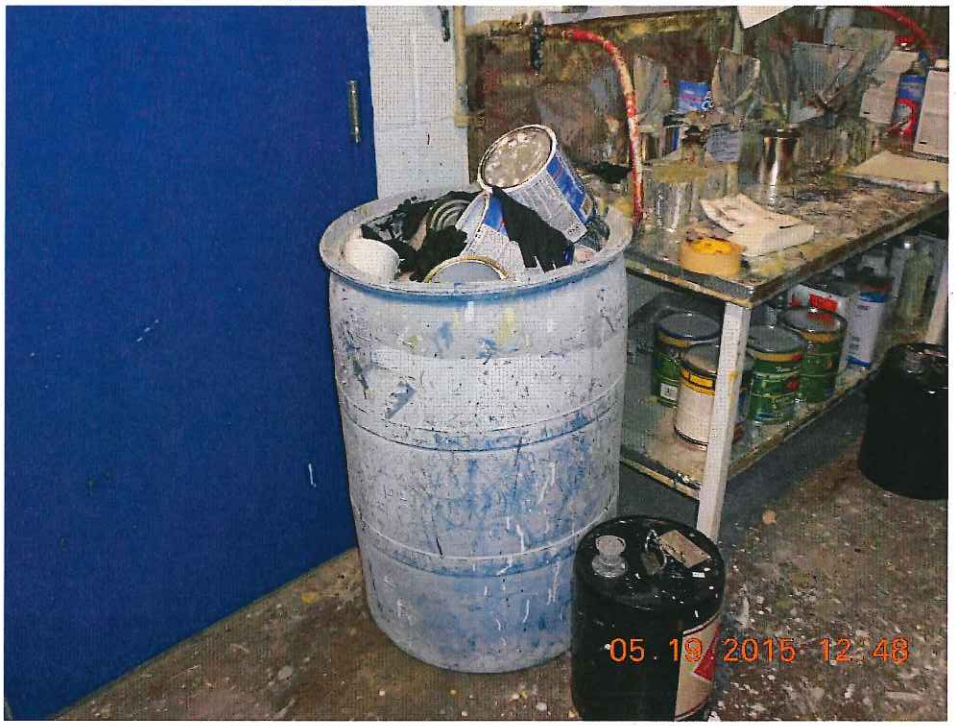



***Photo Number*** 12

***Photo Filename*** DSCN0726.JPG

***Date/Time*** 5/19/2015
1:06:04 PM

***Photographer*** Todd Brown

***Description***

Trash can of sand paper located in the Sanding/Prepping Bay. The container was not labeled or closed. The contents are reportedly added to the hazardous roll-off outside of the Paint Shop.

## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 13

***Photo Filename*** DSCN0727.JPG

***Date/Time*** 5/19/2015
1:15:08 PM

***Photographer*** Todd Brown

***Description***

Two tanks of hazardous waste located in the Paint Shop (two silver tanks in background of photograph). The tanks are used to accumulate paint stripper waste from stripping paint off of aircraft.


***Photo Number*** 14

***Photo Filename*** DSCN0728.JPG

***Date/Time*** 5/19/2015
1:18:30 PM

***Photographer*** Todd Brown

***Description***

Six containers of hazardous waste located in the 90-day storage area.

## Attachment A: Photographs for StandardAero Business Aviation (ILD089637847), Springfield, Illinois

***Photo Number*** 15

***Photo Filename*** DSCN0729.JPG

***Date/Time*** 5/19/2015
1:20:48 PM

***Photographer*** Todd Brown

***Description***

Hopper of material from the Prep Bay at the paint shop. The material will reportedly be added to the hazardous waste roll-off container.


***Photo Number*** 16

***Photo Filename*** DSCN0730.JPG

***Date/Time*** 5/19/2015
1:50:26 PM

***Photographer*** Todd Brown

***Description***

Tote container of reportedly "non-hazardous" rinse waste from a small-scale etching process located in the Etch Alodine Room.

Standard Aero ILD089637847 5/19/2015

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| | **PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)** | |
| | **SUBPART A: GENERAL** | |
| 722.111 | **Section 722.111 Hazardous Waste Determination**<br>Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste?<br>(Under review) Yes_____ No_____ N/A_____<br>Have hazardous wastes been identified for purposes of compliance with Part 728?<br>Yes✓ No_____ N/A_____ | 722.111 |
| 808.121(a) | Has the generator correctly determined if the solid waste(s) it generates is a special waste?<br>Yes_____ No_____ N/A✓ | 808.121(a) |
| 722.112(a) | **Section 722.112 USEPA Identification Numbers**<br>Has the generator obtained a USEPA identification number?<br>Yes✓ No_____ N/A_____ | 722.112(a) |
| 722.112(c) | Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number?<br>Yes✓ No_____ N/A_____ | 722.112(c) |
| | **SUBPART B: THE MANIFEST** | |
| 722.120(a) | **Section 722.120 General Requirements**<br>Does the facility manifest its waste off-site?<br>Yes✓ No_____ N/A_____ | |
| 722.120(b) | Does the manifest designate a facility permitted to handle the waste?<br>Yes✓ No_____ N/A_____ | 722.120(a) |
| 722.120(d) | Has the generator shipped any waste that could not be delivered to the designated facility?<br>Yes_____ No✓ N/A_____ | 722.120(b) |
| 722.121(a) | **Section 722.121 Acquisition of Manifests**<br>Has the generator used: Uniform<br>- an Illinois manifest for wastes designated to a facility within Illinois?<br>Yes_____ No_____ N/A✓ | 722.120(d) |
| 722.121(b) | - a manifest from the State to which the manifest is designated?<br>Yes_____ No_____ N/A✓<br>- an Illinois manifest if the State to which the waste is designated has no manifest of its own?<br>Yes_____ No_____ N/A✓ | 722.121(a)<br>722.121(b) |
| 722.122 | **Section 722.122 Number of Copies**<br>Does the manifest consist of at least 6 copies?<br>Yes_____ No_____ N/A✓ | 722.122 |
| 722.123(a) | **Section 722.123 Use of the Manifest**<br>For each manifest reviewed, has the generator:<br>- signed the certificate by hand?<br>Yes✓ No_____ N/A_____<br>- obtained the handwritten signature and the date of acceptance by the initial transporter?<br>Yes✓ No_____ N/A_____<br>- retained one copy as required by Section 722.140(a)?<br>Yes✓ No_____ N/A_____<br>- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days?<br>Yes✓ No_____ N/A_____ | 722.123(a) |
| 722.123(b) | - has the generator apparently given the remaining copies to the transporter?<br>Yes✓ No_____ N/A_____ | 722.123(b) |
| 722.123(c) | - has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?<br>Yes_____ No_____ N/A✓ | 722.123(c) |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| | **SUBPART C: PRE-TRANSPORT REQUIREMENTS** | |
| 722.130 | Is there any hazardous waste ready for transport off-site? Yes____ No ✓ N/A____<br>If so, is the generator complying with the pre-transport requirements in Subpart C? Yes____ No____ N/A ✓ | 722.130 |
| | **Section 722.134 Accumulation Time** | |
| (722.134(a)) | Has the generator complied with the following requirements: Yes____ No____ N/A____ | |
| (722.134(a)(1)) | A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? open Containers Yes____ No ✓ N/A____ | |
| | and/or | |
| | B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes ✓ No____ N/A____ | |
| | and/or | |
| | C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes____ No____ N/A ✓ | |
| | and/or | |
| | D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes____ No____ N/A ✓ | |
| (722.134(a)(2)) | For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes ✓ No____ N/A____ | |
| (722.134(a)(3)) | For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes____ No ✓ N/A____ | |
| (722.134(a)(4)) | Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? training under review Yes____ No____ N/A____ | |
| | Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows: | |
| | Does the facility accumulate hazardous waste in containers? Yes ✓ No____ N/A____<br>If "No", go to Subpart J. | |
| | **SUBPART I: USE AND MANAGEMENT OF CONTAINERS** | |
| (725.211) | Has the generator closed an accumulation area? Yes____ No ✓ N/A____ | 725.211 |
| (725.214) | If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes____ No____ N/A ✓ | 725.214 |
| (725.271) | If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes ✓ No____ N/A____ | |
| (725.272) | Is the waste compatible with the container and/or liner? Yes ✓ No____ N/A____ | |
| (725.273(a)) | Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes____ No ✓ N/A____ | |
| (725.273(b)) | Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes ✓ No____ N/A____ | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.274) | Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?<br>Yes✓ No_____ N/A_____<br>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)<br>Yes✓ No_____ N/A_____ | |
| (725.276) | Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?<br>Yes_____ No_____ N/A✓<br>**Note:** See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes. | |
| (725.277) | Is the owner/operator complying with the requirements concerning incompatible wastes?<br>Yes✓ No_____ N/A_____<br>COMMENTS: | |
| (725.278) | **Section 725.278 Air Emission Standards**<br>Is the owner or operator managiing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725?<br>Yes✓ No_____ N/A_____<br>Comments: | |
| | Does the generator accumulate and/or treat hazardous waste in tanks?<br>Yes✓ No_____ N/A_____<br>**Note:** If "No", go to Subpart C. | |
| | **SUBPART J: TANK SYSTEMS** | |
| | Has the generator closed an accumulation area?<br>Yes_____ No✓ N/A_____ | 725.211 |
| (725.211)<br>(725.214) | If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?<br>Yes_____ No_____ N/A✓ | 725.214 |
| (725.290) | Does the facility accumulate or treat hazardous waste in tanks?<br>Yes✓ No_____ N/A_____<br>**Note:** A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.<br>If "No", skip Subpart J.<br>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.<br>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).<br>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart. | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.291(a)) | For tanks **existing** prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?<br>Yes_____ No_____ N/A_____ | |
| (725.291(b)) | Does this assessment consider at least the following:<br>1) design standards for the tank and ancillary equipment?<br>Yes_____ No_____ N/A_____<br>2) hazardous characteristics of the wastes?<br>Yes_____ No_____ N/A_____<br>3) existing corrosion protection measures?<br>Yes_____ No_____ N/A_____<br>4) documented age of the tank system?<br>Yes_____ No_____ N/A_____<br>5) results of a leak test, internal inspection, or other tank integrity examination?<br>Yes_____ No_____ N/A_____<br><br>*IRPE = Independent Registered Professional Engineer | |
| (725.291(c)) | Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?<br>Yes_____ No_____ N/A_____<br><br>**Note:** If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5). | |
| (725.292(a)) | For **new** tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? *<br>Yes_____ No_____ N/A_____<br>Does the assessment include, at a minimum, the following:<br>1) design standards for tanks and ancillary equipment?<br>Yes_____ No_____ N/A_____<br>2) hazardous characteristics of the waste(s) to be handled?<br>Yes_____ No_____ N/A_____<br>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?<br>Yes_____ No_____ N/A_____<br>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic?<br>Yes_____ No_____ N/A_____<br>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave?<br>Yes_____ No_____ N/A_____ | |
| (725.292(g)) | Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?<br>Yes_____ No_____ N/A_____ | |

* do not have copy of original assessment however, a re-assessment letter indicates it was done

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.293(a)) | Is secondary containment provided for any new tank system before being put into service? Yes ✓ No_____ N/A_____<br>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes_____ No ✓ N/A_____<br>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes_____ No_____ N/A ✓<br>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes_____ No_____ N/A ✓<br>or<br>if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes_____ No_____ N/A ✓<br>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes_____ No_____ N/A ✓ | |
| (725.293(b)) | Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes ✓ No_____ N/A_____<br>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes ✓ No_____ N/A_____ | |
| (725.293(c)) | To meet the requirements of Subsection (b), is the secondary containment system:<br>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes_____ No_____ N/A_____<br>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes_____ No_____ N/A_____<br>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes_____ No_____ N/A_____<br>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes_____ No_____ N/A_____<br>and<br>is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes_____ No_____ N/A_____<br>**Note:** A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation. | |
| (725.293(d)) | Does the secondary containment for tanks have one or more of the following:<br>1) a liner (external to the tank); or<br>2) a vault; or<br>3) a double-walled tank; or<br>4) an equivalent device (approved by the Board)? Yes ✓ No_____ N/A_____ | |
| (725.293(e)) | Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes ✓ No_____ N/A_____ | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.293(f)) | Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?<br>Yes ✓ No____ N/A____<br><br>If "No":<br>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?<br>Yes____ No____ N/A____<br>2) Are welded flanges, joints and connections inspected daily?<br>Yes____ No____ N/A____<br>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?<br>Yes____ No____ N/A____<br>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?<br>Yes____ No____ N/A____ | |
| (725.293(i)) | Until such time as secondary containment is provided, are the following requirements being met for all tank systems:<br>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?<br>Yes____ No____ N/A____<br>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?<br>Yes____ No____ N/A____<br>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?<br>Yes____ No____ N/A____<br><br>**Note:** If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296. | |
| (725.294(a)) | Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?<br>Yes____ No ✓ N/A____ | |
| (725.294(b)) | Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:<br>1) spill prevention controls?<br>Yes ✓ No____ N/A____<br>2) overfill prevention controls?<br>Yes ✓ No____ N/A____<br>3) sufficient freeboard in uncovered tanks?<br>Yes____ No____ N/A ✓ | |
| (725.294(c)) | **Note:** If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296. | |
| (725.295(a)) | Does the owner/operator inspect, if present, at least each operating day, the following:<br>1) overfill/spill control equipment?<br>Yes____ No____ N/A____<br>2) the aboveground portion of the tank system for corrosion or releases?<br>Yes____ No____ N/A____<br>3) data from monitoring equipment?<br>Yes____ No____ N/A____<br>4) the construction materials and the area immediately surrounding the external portion of the system?<br>Yes____ No____ N/A____ | |
| (725.295(b)) | If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?<br>Yes____ No____ N/A ✓ | |
| (725.295(c)) | Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?<br>Yes ✓ No____ N/A____ | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.296) | If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:<br>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release?<br>Yes_____ No_____ N/A_____<br>b) removed applicable waste from the system within 24 hours of detection?<br>Yes_____ No_____ N/A_____<br>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water?<br>Yes_____ No_____ N/A_____ | |
| (725.296(d)) | d) notified the Agency within 24 hours of detection of release?<br>Yes_____ No_____ N/A_____<br>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)?<br>Yes_____ No_____ N/A_____<br>**Note:** Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up. | |
| (725.296(e)) | e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system?<br>Yes_____ No_____ N/A_____<br>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment?<br>Yes_____ No_____ N/A_____<br>e)4) met the requirements for a new tank system in the event that a component is replaced during repair?<br>Yes_____ No_____ N/A_____<br>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection?<br>Yes_____ No_____ N/A_____ | |
| (725.296(f)) | f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?<br>Yes_____ No_____ N/A_____<br>**Note:** If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297. | |
| (725.297(a)) | At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?<br>Yes_____ No_____ N/A_____ | |
| (725.297(a)) | Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?<br>Yes_____ No_____ N/A_____ | |
| (725.297(b)) | If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?<br>Yes_____ No_____ N/A_____<br>**Note:** Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H. | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.298(a)) | Are ignitable or reactive wastes placed in a tank system?<br>Yes_____ No__✓__ N/A_____<br><br>If "No", skip to Section 725.299.<br><br>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:<br>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive?<br>Yes_____ No_____ N/A__|__<br>- Section 725.117(b) is complied with?<br>Yes_____ No_____ N/A__|__<br>or<br>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?<br>Yes_____ No_____ N/A__✓__<br>or<br>Is the tank used solely for emergencies?<br>Yes_____ No_____ N/A__✓__ | |
| (725.298(b)) | Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?<br>Yes__✓__ No_____ N/A_____ | |
| (725.299) | Are incompatible wastes/materials placed in the same tank?<br>Yes_____ No__✓__ N/A_____<br><br>If "No", skip to Section 725.300.<br><br>Is Section 725.117(b) being complied with?<br>Yes_____ No_____ N/A__|__<br>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?<br>Yes_____ No_____ N/A__|__<br><br>COMMENTS: | |
| (725.302) | **Section 725.302 Air Emission Standards**<br>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?<br>Yes__✓__ No_____ N/A_____<br><br>Comments: BB is reportedly not applicable based on TOC. | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| | **SUBPART C: PREPAREDNESS AND PREVENTION** | |
| (725.131) | Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?<br>Yes____ No____ N/A____ | |
| (725.132) | Is the facility equipped with the following, if necessary:<br>a) an internal communication or alarm system(s)?<br>Yes____ No____ N/A____<br>b) a telephone or other device to summon emergency assistance from local authorities?<br>Yes____ No____ N/A____<br>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?<br>Yes____ No____ N/A____<br>d) water at adequate volume and pressure for fire control?<br>Yes____ No____ N/A____ | |
| (725.133) | Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment?<br>Yes____ No____ N/A____ | |
| (725.134) | a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?<br>Yes____ No____ N/A____<br>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance?<br>Yes____ No____ N/A____ | |
| (725.135) | Is the facility maintaining adequate aisle space?<br>Yes____ No____ N/A____ | |
| (725.137) | Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:<br>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes?<br>Yes____ No____ N/A____<br>- agreements designating the primary authority where more than one police or fire department might respond?<br>Yes____ No____ N/A____<br>- agreements with State emergency response teams, contractors and equipment suppliers?<br>Yes____ No____ N/A____<br>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility?<br>Yes____ No____ N/A____ | |
| | **SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES** | |
| (725.151(a)) | Is the contingency plan available?<br>Yes____ No____ N/A____<br>If "No", skip to Section 725.155.<br>Is the plan designed to protect human health and the environment from releases to the air, soil and water?<br>Yes____ No____ N/A____ | |
| (725.151(b)) | Has there been a fire, explosion or release of hazardous waste?<br>Yes____ No____ N/A____<br>If "Yes", has the contingency plan been carried out immediately?<br>Yes____ No____ N/A____ | |
| (725.152(a)) | Does the plan describe the actions required for response to:<br>- fires? Yes____ No____ N/A____<br>- explosions? Yes____ No____ N/A____<br>- releases? Yes____ No____ N/A____ | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
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| (725.152(c)) | Does the plan describe arrangements with:<br>- police and fire departments? Yes____ No____ N/A____<br>- hospitals? Yes____ No____ N/A____<br>- contractors? Yes____ No____ N/A____<br>- emergency response teams? Yes____ No____ N/A____ | |
| (725.152(d) | Does the plan contain the current emergency coordinator's name, phone (office and home) and address?<br>Yes____ No____ N/A____ | |
| (725.152(e)) | Does the plan identify all emergency equipment including:<br>- description? Yes____ No____ N/A____<br>- capability? Yes____ No____ N/A____<br>- location? Yes____ No____ N/A____<br>Is the list of emergency equipment up-to-date?<br>Yes____ No____ N/A____ | |
| (725.152(f)) | Does the plan include:<br>- an evacuation plan? Yes____ No____ N/A____<br>- an evacuation signal? Yes____ No____ N/A____<br>- alternate evacuation routes? Yes____ No____ N/A____<br>→ need to put copies of maps | |
| (725.153) | Has the contingency plan (including all revisions) been:<br>a) maintained at the facility? Yes____ No____ N/A____<br>b) submitted to:<br>- police department? Yes____ No____ N/A____<br>- fire department? Yes____ No____ N/A____<br>- hospital? Yes____ No____ N/A____<br>- emergency response teams? Yes____ No____ N/A____ | |
| (725.154) | Has the contingency plan been reviewed and revised whenever:<br>a) regulations are revised? Yes____ No____ N/A____<br>b) the plan fails in an emergency? Yes____ No____ N/A____<br>c) the facility changes in a way that modifies the emergency response necessary?<br>Yes____ No____ N/A____<br>d) information regarding emergency coordinators changes?<br>Yes____ No____ N/A____<br>e) information regarding equipment changes?<br>Yes____ No____ N/A____ | |
| (725.155) | Is the emergency coordinator on-site or on call at all times?<br>Yes____ No____ N/A____<br>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?<br>Yes____ No____ N/A____<br>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?<br>Yes____ No____ N/A____ | |
| (725.156) | If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?<br>Yes____ No____ N/A____<br><br>**Note:** If the facility has had a release, explain in detail. | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (725.116(a)) | **Section 725.116 Personnel Training** WAITING on Records!<br>Does the facility have a training program?<br>Yes_____ No_____ N/A_____<br>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725?<br>Yes_____ No_____ N/A_____<br>Is the program directed by a person trained in hazardous waste management procedures?<br>Yes_____ No_____ N/A_____<br>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?<br>Yes_____ No_____ N/A_____<br>Does the program cover, at a minimum:<br>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems?<br>Yes_____ No_____ N/A_____<br>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?<br>Yes_____ No_____ N/A_____<br>- key parameters for automatic waste feed cut-off systems?<br>Yes_____ No_____ N/A_____<br>- communications or alarm systems?<br>Yes_____ No_____ N/A_____<br>- response to fire or explosions?<br>Yes_____ No_____ N/A_____<br>- response to groundwater contamination incidents?<br>Yes_____ No_____ N/A_____<br>- shutdown of operations?<br>Yes_____ No_____ N/A_____ | |
| (725.116(b)) | Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste?<br>Yes_____ No_____ N/A_____ | |
| (725.116(c)) | Have facility personnel received an annual review of the initial training?<br>Yes_____ No_____ N/A_____ | |
| (725.116(d)) | Are the following documents and records being maintained at the facility:<br>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job?<br>Yes_____ No_____ N/A_____<br>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position?<br>Yes_____ No_____ N/A_____<br>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management?<br>Yes_____ No_____ N/A_____<br>4) records documenting that the training or job experience has been given to and completed by facility personnel?<br>Yes_____ No_____ N/A_____ | |
| (725.116(e)) | Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment?<br>Yes_____ No_____ N/A_____ | |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
|---|---|---|
| (728.107(a)(5)) | **Section 728.107 Waste Analysis and Recordkeeping**<br>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?<br>Yes_____ No_____ N/A_____<br>Is the plan on-site?<br>Yes_____ No_____ N/A_____<br>Does the plan include a detailed physical and chemical analysis?<br>Yes_____ No_____ N/A_____<br>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?<br>Yes_____ No_____ N/A_____<br>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?<br>Yes_____ No_____ N/A_____ | |
| 722.134(c) | **Section 722.134 Satellite Accumulation**<br>Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents?<br>Yes_____ No_____ N/A_____<br>Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?<br>Yes_____ No_____ N/A_____<br>If there are more than 55 gallons of hazardous waste or 1 quart of **acutely** hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?<br>Yes_____ No_____ N/A_____<br>During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?<br>Yes_____ No_____ N/A_____ | |
| 722.134(g) | **Note:** A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled. | |
| | **SUBPART D: RECORDKEEPING AND REPORTING** | |
| 722.140(a) | **Section 722.140 Recordkeeping**<br>Has the generator retained for a period of 3 years:<br>- a copy of each signed manifest?<br>Yes_____ No_____ N/A_____ | 722.140(a) |
| 722.140(b) | Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?<br>Yes_____ No_____ N/A_____ | 722.140(b) |
| 722.140(c) | Has the generator retained for a period of 3 years:<br>- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?<br>Yes_____ No_____ N/A_____ | 722.140(c) |
| 722.140(d) | Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?<br>Yes_____ No_____ N/A_____ | 722.140(d) |
| 722.141(a) | **Section 722.141 Annual Reporting**<br>Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?<br>Yes_____ No_____ N/A_____<br>**Note:** If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section. | 722.141(a) |

| Regulation | RCRA GENERATOR INSPECTION CHECKLIST (PART 722) | Violation |
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| 722.141(b) | Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year?<br>Yes_____ No_____ N/A ✓ | 722.141(b) |
| | **Section 722.142 Exception Reporting** | |
| 722.142(a)(1) | If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste?<br>Yes_____ No_____ N/A ✓ | 722.142(a)(1) |
| 722.142(a)(2) | If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section?<br>Yes_____ No_____ N/A ✓ | 722.142(a)(2) |
| 722.143 | **Section 722.143 Additional Reporting**<br>Has the generator furnished additional reports as required by the Director?<br>Yes_____ No_____ N/A ✓ | 722.143 |
| | **SUBPART E: EXPORTS OF HAZARDOUS WASTE** | |
| 722.150 | Is the generator an exporter of hazardous waste?<br>Yes_____ No_____ N/A_____<br>If "Yes", has the generator complied with the requirements of Subpart E?<br>Yes_____ No_____ N/A_____ | 722.150 |
| | **SUBPART F: IMPORTS OF HAZARDOUS WASTE** | |
| 722.160 | Is the generator an importer of hazardous waste?<br>Yes_____ No_____ N/A_____<br>If "Yes", has the generator complied with the requirements of Subpart F?<br>Yes_____ No_____ N/A_____ | 722.160 |
| | **SUBPART G: FARMERS** | |
| 722.170 | Is the generator a farmer?<br>Yes_____ No_____ N/A_____<br>If "Yes", has the generator complied with the requirements of Subpart G?<br>Yes_____ No_____ N/A_____ | 722.170 |
| | COMMENTS: | |

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